

Special Master George Finkle

BEFORE THE INSURANCE COMMISSIONER
OF THE STATE OF WASHINGTON

In the Matter of the Application
regarding the Conversion and
Acquisition of Control of Premera Blue
Cross and its Affiliates.

No. G 02-45

EXPEDITED MOTION FOR
CONFERENCE FOR SCHEDULING
DEPOSITIONS AND DISCOVERY
FOR DEPOSITIONS

Premera hereby makes an expedited motion to the Special Master to schedule a telephone conference with the OIC Staff, Premera, the Lead Intervenor Counsel and the Special Master. Premera requests that this conference be scheduled for the morning of Tuesday, November 11th or as soon thereafter as possible.¹

Premera proposes three subjects for the conference: (1) for the parties to provide the Special Master with whatever agreements they may have reached by the time of the conference in regard to the scheduling of depositions and the providing of discovery for the depositions; (2) for the parties to submit whatever suggestions they have for scheduling depositions and for discovery production; and (3) for the Special Master to

¹ Tuesday, November 11th is a holiday for some. Assistant Attorney General Melanie deLeon, who is representing the OIC Staff at this time, has stated that, even though she has the day off, she is willing to participate in a telephone conference from her home on November 11th if one is scheduled for that day.

EXPEDITED MOTION FOR CONFERENCE FOR
SCHEDULING DEPOSITIONS AND DISCOVERY
FOR DEPOSITIONS - 1

K:\34458\00009\TEK\TEK_P238Y

PRESTON GATES & ELLIS LLP
325 FOURTH AVENUE
SUITE 2000
WASHINGTON, D.C. 20004

1 direct how the depositions shall be scheduled, what requested discovery documents shall
2 be provided prior to each deposition, and when such documents should be provided.
3 Other parties may have additional proposed subjects, which they can propose in response
4 to this motion.

5 Because of the short time available for discovery and because of the numerous
6 depositions that are anticipated, Premera does not have any objection, if the Special
7 Master does not object, to the other parties responding to this Motion by way of email,
8 rather than a more formal pleading document. Nor does Premera object to the other
9 parties responding with their objections or proposed schedules as late as 15 minutes before
10 the hearing.

11 This motion is supported by the accompanying Declaration of Thomas E. Kelly, Jr.

12 DATED this 10th day of November, 2003.

13
14 PRESTON GATES & ELLIS LLP

15
16 By Robert B. Mitchell
17 Thomas E. Kelly, Jr., WSBA # 05690
18 Robert B. Mitchell, WSBA # 10874
19 Attorneys for Applicant PREMERA
20 and Premera Blue Cross
21
22
23
24
25

EXPEDITED MOTION FOR CONFERENCE FOR
SCHEDULING DEPOSITIONS AND DISCOVERY
FOR DEPOSITIONS - 2

K:\34458\00009\TEK\TEK_P238Y

PRESTON GATES & ELLIS LLP
925 FOURTH AVENUE
SUITE 2000
SEATTLE, WA 98101